

FILED
4/16/2020

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

AUTO DRIVEAWAY FRANCHISE
SYSTEMS, LLC,

Plaintiff,

v.

JEFFREY CORBETT, AUTO DRIVEAWAY
RICHMOND, LLC, INNOVAUTO USA,
LLC, TACTICAL FLEET, LLC, and
CHRISTINE WARHURST,

Defendants.

Case No.: 18-cv-04971

The Honorable Manish S. Shah

**STATUS REPORT REGARDING BANKRUPTCY
PROCEEDINGS AND RETENTION OF COUNSEL**

Pro se Defendant Jeffrey Corbett submits this Status Report Regarding Bankruptcy Proceedings and Retention of Counsel:

On April 16, 2020, the attached (1) Debtors' Application to Retain and Employ Kutak Rock LLP as Their Special Counsel and (2) Notice of (A) Filing of Application to Employ and (B) Hearing on Motion if Necessary (Only to be Held if Objection Timely Filed), was filed in the United States Bankruptcy Court, Eastern District of Virginia, Richmond Division. See **Exhibits A and B**.

In addition, a Motion to Approve Litigation Funding will be filed shortly, seeking approval of a Litigation Funding Agreement, entered into by myself, Helen Christine Corbett, and Legalist Fund II, L.P. I will provide a copy of that pleading to the Court promptly upon filing.

The fee agreement between Kutak Rock LLP and the Defendants in this case, as well as the Litigation Funding Agreement, is contingent on approval of the agreements by the U.S. Bankruptcy

Court, E.D. Virginia. Upon approval, Kutak Rock LLP will enter its appearance in this lawsuit on behalf of all Defendants.

Based on my conversations with Kutak Rock, assuming their retention is approved, it is my understanding that Kutak Rock intends to respond to the currently pending Motion for Default Judgment by the May 8th deadline imposed by the Court on March 27, 2020 (as modified by the March 30, 2020 U.S. District Court for the Northern District of Illinois Second Amended General Order 20-0012).

The undersigned is willing to update the Court on any matters of concern if the Court wishes to receive any additional information.

Respectfully submitted this 16th day of April, 2020.

s/ Jeffrey Corbett

Jeffrey Corbett

Pro se Defendant

CERTIFICATE OF SERVICE

I certify that on April 16, 2020 a true and correct copy of the foregoing was filed by electronic mail on the Court and on the parties at the following addresses:

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s/ Jeffrey Corbett